IN THE SUPREME CO	OURT OF THE STATE OF ALASKA
In Re 2021 Redistricting Cases.) Supreme Ct. No. S-18332) Superior Court Case Nos.) 3AN-21-08869 CI

MOTION FOR LEAVE TO FILE OVERLENGTH PETITION FOR REVIEW

The City of Valdez and Mark Detter ("Petitioners"), through their counsel, Brena, Bell & Walker, P.C., hereby move the Court for leave to file an over-length Petition for Review comprised of sixty-nine pages. This Motion is supported by the Affidavit of Jake W. Staser filed concurrently herewith.

In accordance with the Court's Scheduling Notice dated February 22, 2022, petitions that exceed 50 pages must be accompanied by a motion to accept over-length. The over-length Petition for Review is necessitated by the underlying points on appeal and the subject matter, which calls in to question the legal and factual basis of the Board's plan as accepted by the trial court's final order. The Petition necessarily includes a detailed discussion of the legal standards and relevant facts, which could not be fully provided to this Court in a pleading limited to 50 pages even with substantial efforts at reduction. A proposed order accepting the Motion to Accept Overlength Motion is provided for the Court's signature.

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RESPECTFULLY SUBMITTED this 2nd day of March, 2022.

BRENA, BELL & WALKER, P.C. Counsel for Petitioners CITY OF VALDEZ and MARK DETTER

By <u>//s// Jake W. Staser</u>

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AFFIDAVIT OF JAKE W. STASER IN SUPPORT OF VALDEZ-DETTER'S MOTION FOR LEAVE TO FILE OVERLENGTH PETITION FOR REVIEW

STATE OF ALASKA)
) ss
THIRD JUDICIAL DISTRICT)

JAKE W. STASER, being first duly sworn upon oath, deposes and states:

- 1. I am an attorney with the firm of Brena, Bell & Walker, P.C., counsel for Petitioners in the above-entitled action.
- 2. Petitioners' Petition for Review, filed concurrently herewith, is sixty-nine pages long, exclusive of the cover and tables.
- 3. Counsel has made diligent efforts to reduce the length of the Petition for Review in order to make the necessary points to support Petitioners' assertions in this matter; the Petition has necessarily expanded beyond the 50-page limit set forth in the Scheduling Notice dated February 22, 2022.
- 4. The Petition is responsive to the superior court's Finding of Facts and Conclusions of Law (Order) of the underlying appeal and necessarily covers the multifaceted issues raised in that 171-page Order. The Petition includes arguments selected

BRENA, BELL & WALKER, P.C. 810 N Street, Suite 100 Anchorage, AK 99501 Phone: (907) 258-2000 Fax: (907) 258-2001 www.brenalaw.com from the points on appeal and an extensive discussion of law and facts relevant to both the underlying Alaska Redistricting Board proceeding and the superior court proceeding.

UNDER PENALTY OF PURGERY, I declare the statements herein are true to the best of my knowledge and belief.

DATED this 2nd day of March, 2022.

//s// Jake W. Staser

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IN THE SUPREME CO	OURT OF THE STATE OF ALASKA	
In Re 2021 Redistricting Cases.) Supreme Ct. No. S-18332) Superior Court Case Nos.) 3AN-21-08869 CI	
[PROPOSED] ORDER GRANTING MOTION TO FILE OVERLENGTH PETITION FOR REVIEW		
This Court, having considered	I the City of Valdez and Mark Detter's Motion for	
Leave to File Overlength Brief and Af	ffidavit in support thereof, and any responses thereto,	
and being fully apprised,		
HEREBY ORDERS, that the r	notion is GRANTED.	
DATED this day of	, 2022.	
	Justice	

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